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April 20, 2022

**VIA ECF & EMAIL (Failla [NYSDChambers@nysd.uscourts.gov](mailto:NYSDChambers@nysd.uscourts.gov))**

Judge Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

**Re: *Martínek v. AmTrust Financial Services, Inc.*, 1:19-cv-08030-KPF (S.D.N.Y.)**

Dear Judge Failla:

The parties are pleased to report that they have reached an agreement in principle to settle this action on a class-wide basis.

Accordingly, the parties respectfully move this Court to continue all existing deadlines for 30 days, while they draft a stipulation of settlement.<sup>1</sup> Once a settlement stipulation is executed, the parties will propose a date for the Court's consideration whereby Class Counsel will submit preliminary approval papers.

The parties thank the Court for its attention to this matter. The parties are available at the call of the Court should Your Honor have any questions.

Respectfully submitted,

**WOLF POPPER LLP**

/s/ Adam J. Blander  
Adam J. Blander

*Class Counsel*

Respectfully submitted,

**QUINN EMANUEL URQUHART  
& SULLIVAN, LLP**

/s/ Kevin S. Reed  
Kevin S. Reed

*Counsel to Defendants*

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<sup>1</sup> The most immediate deadline falls on this upcoming Monday, April 25, 2022, where Class Counsel is due to seek approval of their plan notifying class members of the Court's February 3, 2022 Opinion and Order granting class certification, a notice plan now obviated by this settlement in principle.

The Court is in receipt of the parties' above letter. For the reasons stated above, the Court hereby STAYS all existing deadlines pending further order of the Court. The parties are hereby ORDERED to file a letter either proposing a date for the submission of the parties' preliminary approval briefing or providing a status update on or before **May 23, 2022**.

The Clerk of Court is directed to terminate the motion at docket entry 87.

Dated: April 20, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE